

Reporting Requirements of the Federal Funding Accountability & Transparency Act (FFATA) and Using the FFATA Subaward Reporting System (FSRS)

Karen F. Lee
Office of Management & Budget
Office of Federal Financial Management



What Are We Talking About?



- Sec. 1 What is the Federal Funding Accountability and Transparency Act (FFATA)?
- Sec. 2 What is the FFATA Sub-award Reporting System (FSRS)?

- Sec. 3 What is Federal Spending Transparency & USAspending.gov?
- Sec. 4 What are our Next Steps?



What Are We NOT Talking About?

- Contract reporting under FFATA
- Highly technical contours of the Federal Sub-award Reporting System
- Implementation of the Digital Accountability and Transparency Act (DATA Act)





Section 1:

What is the Federal Funding Accountability and Transparency Act (FFATA)?



Federal Funding Accountability and Transparency Act



The Federal Funding Accountability & Transparency Act of 2006 (FFATA) (and subsequent 2008 amendments) requires:

- Information disclosure of entities receiving Federal funding through Federal awards such as Federal grants and their sub-grants.
- Disclosure of executive compensation for certain entities.
- The establishment of a publicly available, searchable website that contains information about each Federal award.
- Federal agencies to comply with OMB guidance and instructions and assist OMB in implementation of website, www.USAspending.gov.

Bottom Line: Prime grant recipients with awards of \$25K or more must report associated first-tier sub-awards of \$25K or more





Grants/Cooperative Agreements Not Subject to Reporting

- Grants that are funded by the Recovery Act.
- Federal awards to individuals who apply for or receive Federal awards as natural persons.
- Federal awards to entities that had a gross income, from all sources, of less than \$300,000 in the entities' previous tax year; and
- Federal awards, if the required reporting would disclose classified information.

*Note: Federal Agencies <u>will not</u> submit sensitive, but not classified, award information. Contact your grant manager with any concerns about your award's information.



When are Reports Submitted?

By the end of the month following the month after the subaward or obligation was made.

Example:

A grant was awarded on March 1, 2014, the grant was greater than \$25,000, and the subaward for over \$25,000 was made on April 15, 2014.

The prime recipient would have to submit the subaward report to FSRS.gov by May 31, 2014.

*Note: Once a subaward report is submitted in FSRS.gov, no other reports are required for that subaward unless there are modifications to that subaward during its lifecycle.

How does a Prime Awardee record adjustments (up or down) to the award amount?

If an award initially reported to USAspending.gov has a downward adjustment in the obligation amount, then that needs to be amended. If then in year two, additional money is put to the award, then a modification to the award must be made at that time.



How Does Grants Reporting Occur?

- Federal agencies submit basic award information for all Federal grants to USAspending.gov once awarded.
- Prime recipients of Federal awards that meet the reporting criteria are required to report in FSRS.gov.
- Sub-recipients do not submit reports in FSRS.gov; however, they need to:
 - Have an active DUNS number.
 - Provide information to the prime recipient on the subaward.

*Note: Reporting responsibilities cannot be delegated to sub-recipients.

Who is Responsible for Submitting?

Who?	Reports what?	How?
Federal Agency	Prime award information for Federal awards \$25K or more	FAADS-PLUS file submission to USAspending.gov for grants
Prime recipient	Prime recipient information Executive compensation First-tier sub-awards of \$25K or more	DUNS / SAM.gov SAM.gov FSRS.gov
Sub-awardee	Required entity information, including executive compensation information.	Provide to Prime Recipient: -DUNS Number -Executive Compensation responses -SAM.gov registration verification (optional)



Why You Need to Report



- Prime recipients are responsible for reporting first-tier subawards of \$25k or more
- FFATA terms operate the same way as other award terms and conditions and the penalties are the same
- Penalties can include the following:
 - Federal agency may impose additional terms and conditions
 - □ Temporarily withhold cash payments pending correction of the deficiency
 - Disallow all or part of the award
 - Wholly or partly suspend or terminate the award
 - □ Withhold further awards for the project or program
 - □ Take other remedies that may be legally available
- Federal agencies decide what consequences will be imposed on prime recipients for non-compliance.
- Prime recipients decide what consequences will be imposed on sub-recipients for non-compliance.





Defining Subaward

The Federal Funding Accountability & Transparency Act of 2006 (FFATA) (and subsequent 2008 amendments) requires:

- Information disclosure of entities receiving Federal funding through Federal awards such as Federal grants and their sub-grants.
- ■For grants, a "subaward" means a legal instrument to provide support for the performance of any portion of the substantive project or program for which you received this award and that:
 - the prime recipient awards to an eligible sub-recipient; or
 - sub-recipient at one tier awards to a sub-recipient at the next lower tier.

What Info Must Be Reported for Grant Subawardees?

Subaward Information

- DUNS number or DUNS+4
- Subawardee name
- Amount of subaward
- Subaward Obligation Date
- Subaward Project Description
- Subawardee Principal Place of Performance (City,State, Country, Zip+4, Congressional District)
- Subaward number
- Subawardee Executive Compensation --The total compensation and names of the top five executives for prime recipients or sub-recipients that meet the revenue thresholds.





Section 2:

What is the FFATA Sub-award Reporting System (FSRS)?



FFATA Sub-award Reporting System



"FSRS"

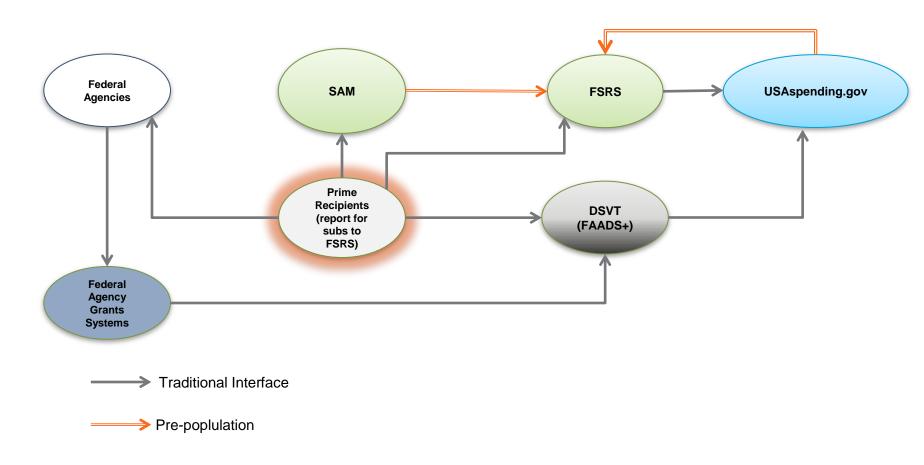
(www.fsrs.gov)

- FFATA requires a system to allow prime grant recipients to be able to report on sub-award activity and executive compensation.
- FSRS enables prime recipients to report sub-award & executive compensation data and then provides this data for display on USAspending.gov
- Uses existing sources to pre-populate prime recipient data and sub-recipient data from:
 - Dun & Bradstreet (D&B, www.dnb.com)
 - SAM.gov
 - Grants: USAspending.gov's Data Submission and Validation Tool (DSVT) template
- FSRS supports online reporting (single program / multiple subawards) and batch upload reporting (multiple programs / multiple subawards).





Diagram of the Awardee Architecture System Interface (Grants View)



Note: FPDS and Contract Systems are not included





In FSRS, Prime Recipients Can...

Manage FFATA Reports

- Search for an Award
- Create New FFATA Subaward Report
- Save Draft FFATA Subaward Report
- Delete Draft FFATA Subaward Report
- Submit New FFATA Subaward Report
- Reopen and Revise Submitted FFATA Subaward Report
- Copy Existing FFATA Subaward Report
- Manage FFATA Subaward Report List
- Submit Multiple FFATA Subaward Reports

Manage Awardee Worklist

- Organize Prime Awards Associated with Registered DUNS
- Search for Prime Award
- Add Prime Award to / Remove Prime Award from Worklist





How to Prepare for Report Submission

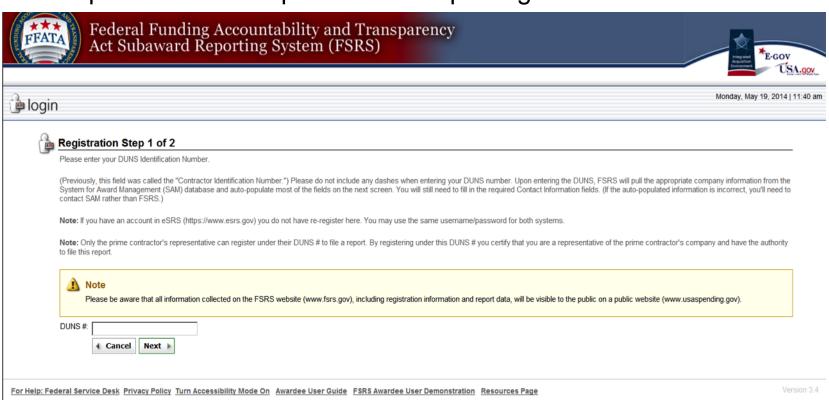
Before reports can be submitted in FSRS.gov, prime recipients must...

- 1. Obtain a Data Universal Numbering System (DUNS) number from Dun and Bradstreet at www.dnb.com for your organization if they do not have one.
- 2. Register with SAM.gov. If registered, verify the registration is active and renew annually.
- 3. Register on FSRS.gov with your organization's DUNS number and a contact person to be responsible for reporting.



Registering in FSRS.gov

Register on FSRS.gov with your organization's DUNS number and a contact person to be responsible for reporting.







Registering in FSRS.gov: Continued

Key things to know about registering on FSRS.gov:

- Email addresses in user profile will be the user login ID.
- Each user account (i.e., email address) can only be associated with one DUNS number.
- Only one email address can be associated with a DUNS number.
- If you have multiple awards under different DUNS numbers, a different email address must be used for each DUNS number.
- Once the user profile is created, it cannot be deleted. Contact the Federal Service Desk at www.fsd.gov (toll free at 1-866-606-8220) to request changes to be made on the account.

FSRS Demo:

Step by Step Process for Submitting an Online FFATA Report

Federal Funding Accountability

Go to: www.fsrs.gov





About FSRS

The Federal Funding Accountability and Transparency Act (FFATA) was signed on September 26, 2006. The intent is to empower every American with the ability to hold the government accountable for each spending decision. The end result is to reduce wasteful spending in the government. The FFATA legislation requires information on federal awards (federal financial assistance and expenditures) be made available to the public via a single, searchable website, which is www.USASpending.gov.

The FEATA Subaward Reporting System (ESRS) is the reporting tool Federal prime awardees (i.e. prime

Documents

egovi: USLov

User Guides

» FSRS Awardee Guide

Training Materials

» FSRS Awardee User Demonstration

News

Ouestion of the Month:

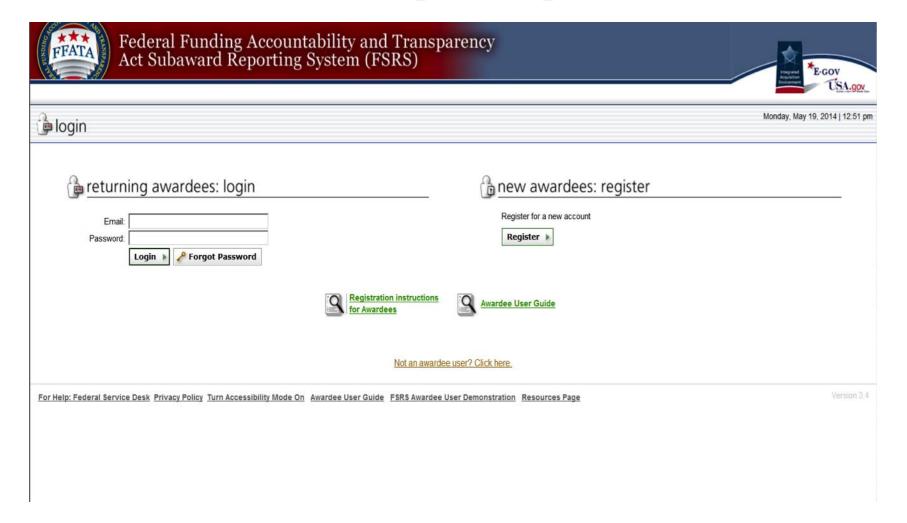
Is my company required to file a FFATA Subaward Report in FSRS? View the answer

Coming Soon!

On October 29, 2010, grants subaward reporting functionality will be available on FSRS.gov.

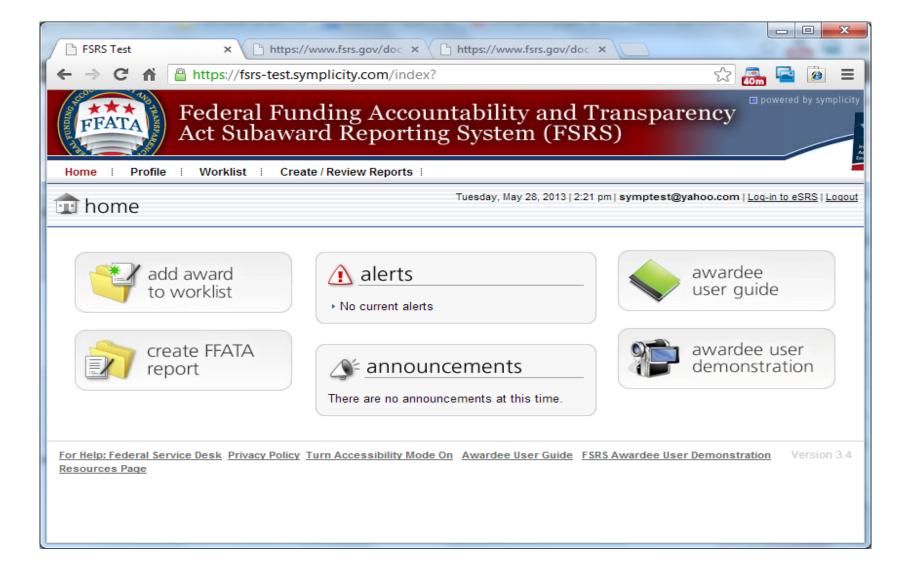


FSRS Awardee Login Page





FSRS Prime Recipient Homepage



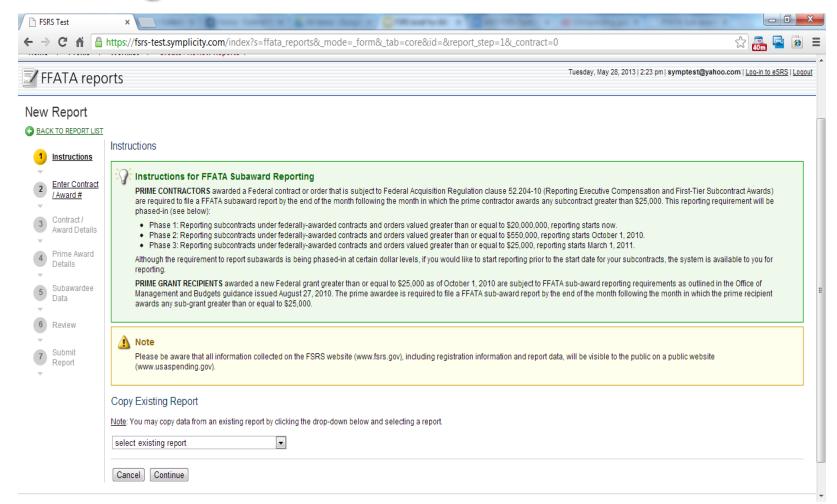


Create New FFATA Subaward Report



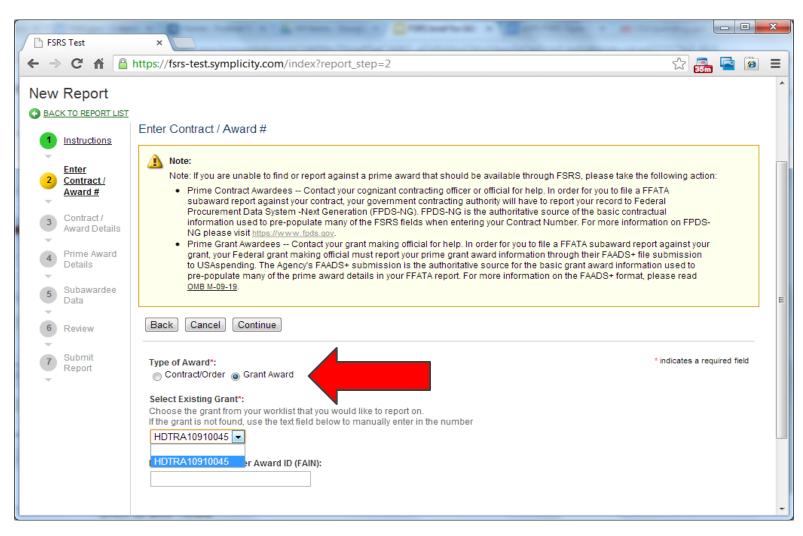


Step 1: Create a new report / copy existing



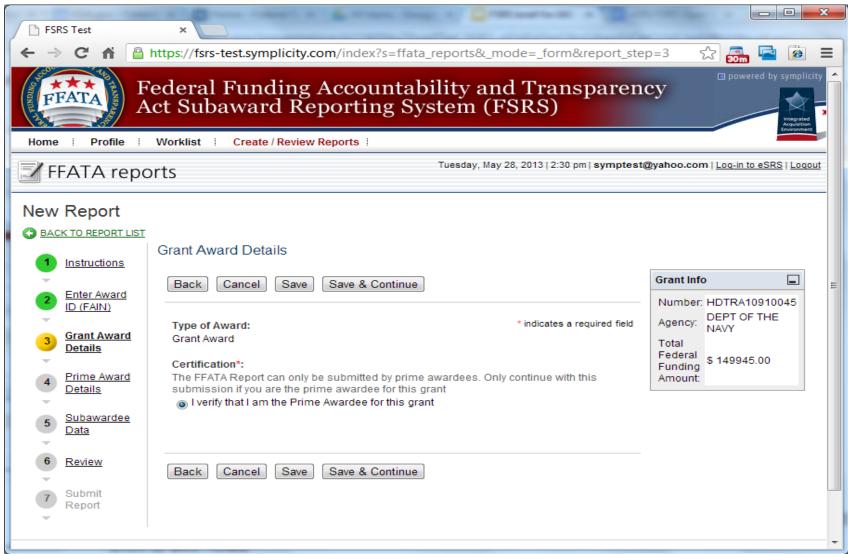
Step 2: Select Grant Award





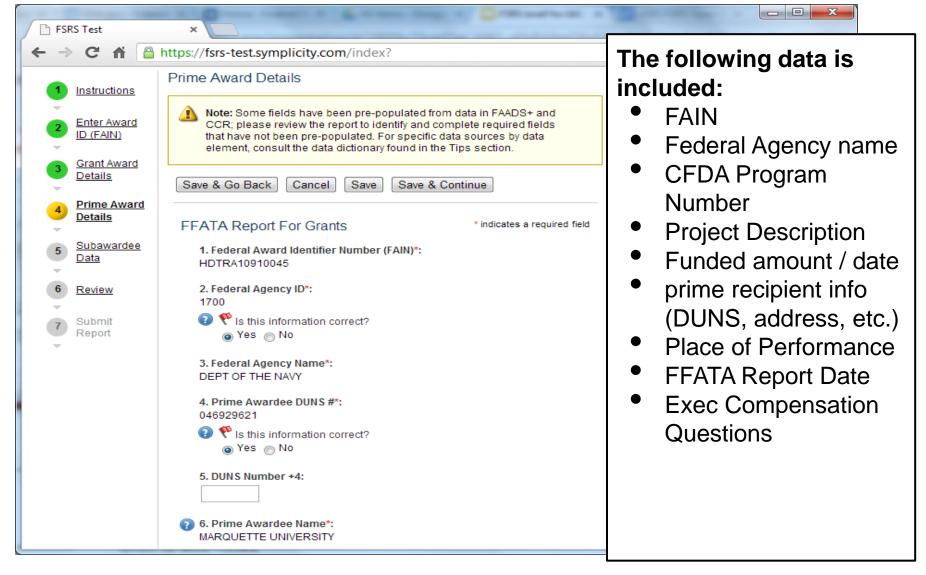
Step 3: Verify Award Information



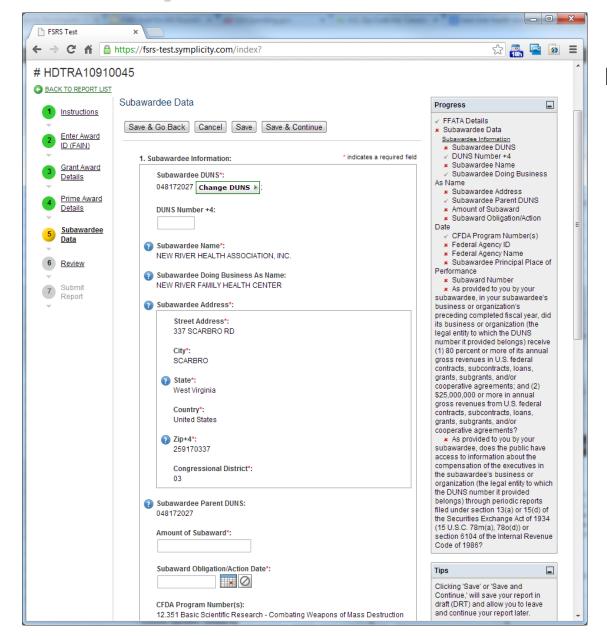


Step 4: Enter Prime Award / Awardee Details





Step 5: Enter Sub-Award Data

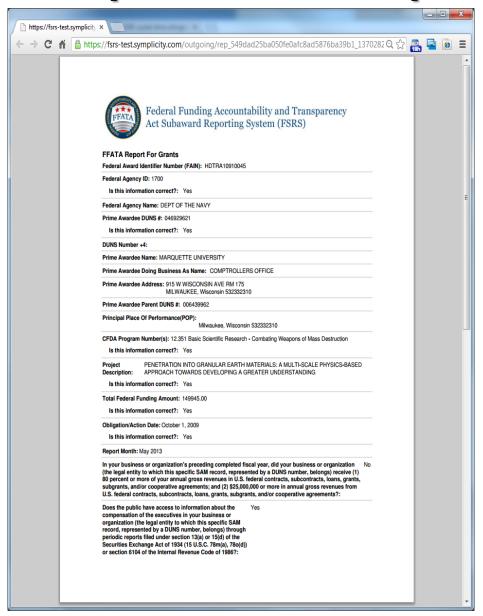


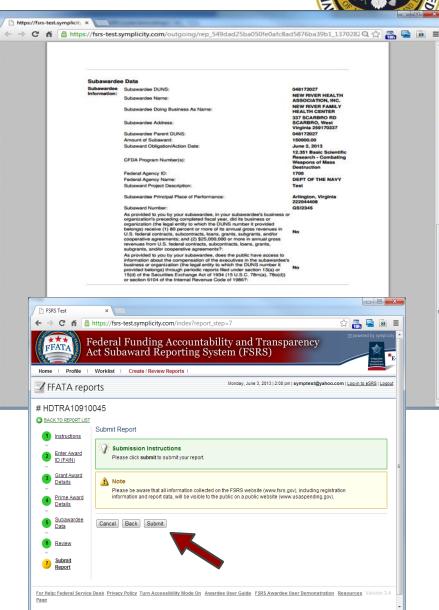


Prime enters the following:

- Amount of subaward
- Subaward date
- Project description
- Principal Place of Performance
- Subaward Number
- Executive Compensation Information

Step 6: Review Report and Submit





How do I edit an existing report in FSRS?



- Step 1: Go to www.FSRS.gov
- Step 2: Click on "Awardee".
- Step 3: Login to FSRS using your user ID and Password.
- Step 4: Click "Create/Review Reports" and select "FFATA Reports".
- Step 5: Locate the desired report using the "Search Filters" option.
- Step 6: Click the "Edit" icon beside the report you wish to edit.
- Step 7: If the report is Submitted, you will need to "Reopen" the report to be able to make any changes. To do so, select "Reopen to Edit Report" button from the "Report History" box in the right sidebar. Make your desired changes and resubmit.



The batch upload capability allows users to upload a single program report or multiple program reports in one upload.

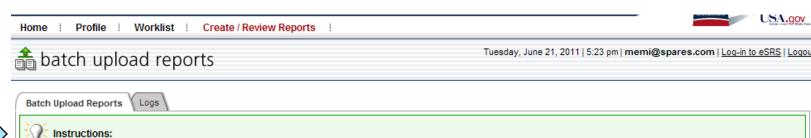
Step 1. Access Batch Uploads by Clicking on the File / Review Reports tab on FSRS main navigation bar. Choose the "Batch Upload Reports" option.

Batch upload main navigation screenshot:





Step 2: Review the on-screen instructions.





Please choose the report type that you would like to batch upload and choose whether you are using the Excel or XML templates. The data must match the template exactly for the import to process correctly.

Excel: Please specify the field delimiter in your data file. The template provided is in excel format; after populating the template, you MUST save the file in Commas Separated (.csv) or Tab Delimited format by clicking "save as" and choosing one of the specified formats.

If your FFATA report contains more than one set of subcontractor/subawardee data, you MUST specify the additional subcontractor/subawardees in the immediate rows following the row that contains the report data. In these rows, you must specify the contract number (and reference number if applicable) if filing for contracts OR Award ID (FAIN) if filing for grants AND the relevant reporting period to ensure that the sub data is added to the correct report; you may leave all other columns empty except for the subcontractor/subawardee data specific fields for these rows.

XML: You may also submit one or more FFATA reports using either the contracts or grants XML template below. Click Here to view the schema.

The XML/Excel template files shown below are designed for use within FSRS interface (meaning to be used from this screen when doing a batch import). Please see "Resources Page" documents "Report Submission Web Services Technical Documentation (Contracts)" and "Report Submission Web Services Technical Documentation (Grants)" for XML samples for use with web services.

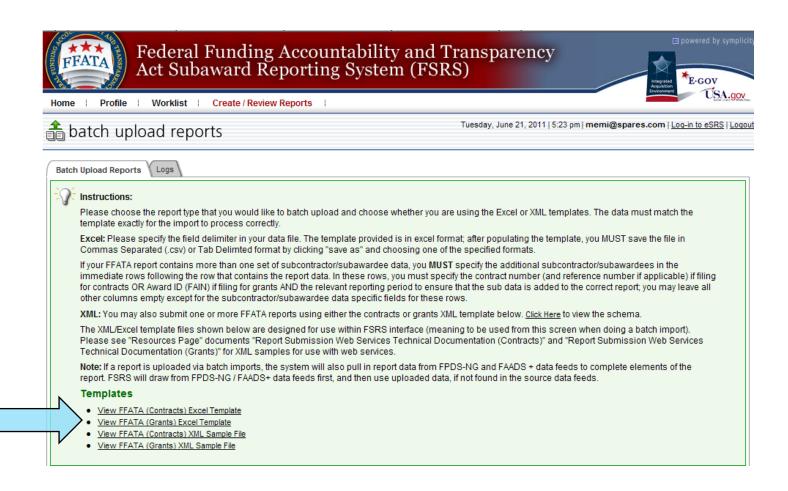
Note: If a report is uploaded via batch imports, the system will also pull in report data from FPDS-NG and FAADS + data feeds to complete elements of the report. FSRS will draw from FPDS-NG / FAADS+ data feeds first, and then use uploaded data, if not found in the source data feeds.

Templates

- View FFATA (Contracts) Excel Template
- View FFATA (Grants) Excel Template
- View FFATA (Contracts) XML Sample File
- View FFATA (Grants) XML Sample File



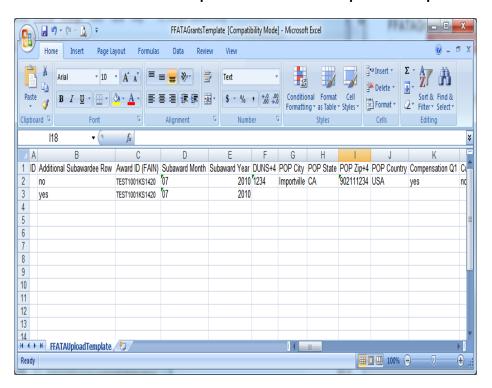
Step 3: Download the FFATA Excel Template





Grants Batch upload example:

Step 4: Save the FFATA Excel Template file to computer. Open file.



Step 5: Delete all sample data except for the column headers in Row 1.



Step 6: Begin entering sub-award data by prime award number.

- Enter all sub-awards made against the given prime award in the given month.
- Columns B-M are prime award data elements; columns N-Z are subaward data elements.
- Follow the Grant Batch Upload User Guide Data Elements Guide (Page 7-13) and the FFATA (Grants) Excel Format Table (Page 28-29)
- Do NOT change the template structure.

Step 7: Review data accuracy and format of the data and save excel file. This is the file to update if the report is rejected.

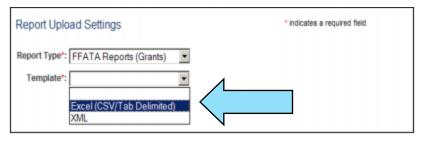
Step 8: Use the "Save As" feature in Excel to save the file as a CSV Comma Delimited File or Tab Delimited File.

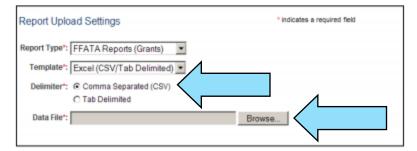
Note: Mark the first sub-award row "no" and any additional sub-award rows "yes." When entering information for more than one prime award, start a new subaward report by entering "no" in the first subaward row.



Step 9: Return to FSRS and go back to the Batch Upload Section.

Step 10: Choose the report type (FFATA Reports (Grants); the template (which ties to file format (excel (CSV/Tab delimited) or XML). If using Excel, specify the delimiter type used in saved template file (CSV or Tab Delimited).





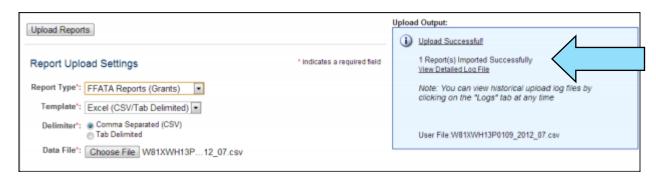
Step 11: Click Browse to navigate to the saved CSV file to upload. Select file. Click Upload button.

.

Batch Upload Process: Step-by-Step



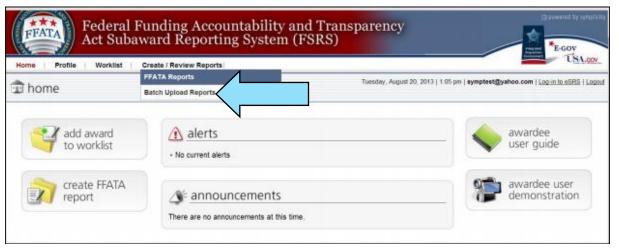
•When import is complete, the system displays the import results of the file upload process on a confirmation section of the screen: "Upload Output".



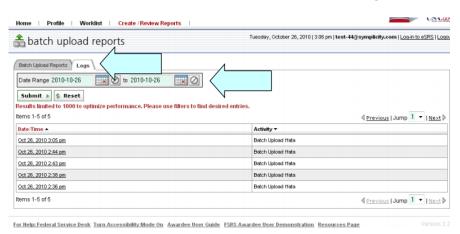
- •Any upload errors are described. If presented, a user should click the link "View Detailed Log File" to review the specific error information.
- •Errors can be corrected in the upload file, and the user can repeat the steps above as appropriate (assumes the error was tied to the data saved in the uploaded file).

Batch Upload Process: Step-by-Step

 Users can review the log of previous batch uploads on the "Logs" tab of the Batch Upload Reports navigation.



 Users can set date filters and click "submit" to review historical import logs (users are restricted to a maximum 3 month period for log searches).







Section 3:

What is Federal Spending Transparency & USAspending.gov?





USAspending.gov

www.usaspending.gov



OMB's June 2013 Memo: Improving Data Quality on USAspending.gov

- The Administration's actions to improve data quality began in 2009 with requirements that Federal agencies begin improving the quality of procurement data and have matured to track closely the recommendations of the Government Accountability and Transparency Board (GATB), which the President created to leverage the lessons learned from the Recovery Act.
- Since 2009 Federal agencies have been required to verify the quality (timeliness, completion, and accuracy) of Federal procurement awards and the Administration has recently expanded its data quality efforts to encompass more data (i.e., financial assistance data) that are available to the public on USAspending.gov.
- In June of 2013, OMB issued guidance ("Improving Data Quality for USAspending.gov") to Federal agencies to improve the quality of spending data being reported to USAspending.gov. The expanded efforts to verify obligations for all Federal funding shared via USASpending.gov include requirements for Federal agencies to use data in financial systems to verify obligations.
- Going forward, efforts to improve data quality posted on USAspending.gov will be significantly influenced by the recently passed DATA legislation which tackles data quality problems through requirements such as establishing data standards as well as GAO's current work on revising its "Standards and Internal Control in the Federal Government" (aka Green Book).



Enhancements to USAspending.gov

- Under the FY 2014 President's Budget, OMB transferred programmatic responsibilities over the USAspending.gov website from GSA to Treasury. The Consolidated Appropriations Act of 2014 provided \$5.5 million to Treasury to establish a government-wide transparency office and improve the USAspending.gov website.
- Treasury is working closely with OMB and partner agencies to deliver the following near term enhancements by February 2015:

User Interface and Website Enhancements

Website Refresh: The USAspending.gov redesign effort will address feedback from stakeholders, including citizens, Congress, oversight and civic groups as well government users and the media. Items include: refreshing site visually, correct broken links, etc.

Data Quality (Accuracy and timeliness)

Clean-up Data: Implement simple data validation techniques to flag anomalous information (e.g., incorrect state spelling).

Updated Visualizations/Enhanced Data Exploration

- New Map Functionality: Add interactive maps (e.g., Google Maps or OpenStreetMap) and richer visual presentation and interactivity, enabling the user to view the information by locality. This mapping functionality is understood to not distort or change the underlying agencies' reported data to USAspending.gov.
- □ <u>Enhance Search Functionality</u>: Enhance user data exploration experience and implement "intelligent" search functionality.





Section 4:

What are our Next Steps?

(you are our partners!)





Opportunities for Continued Improvement

Challenges:

- Lack of control totals to verify accuracy of spending data and financial data and accountability to stakeholders.
- □ Lack of high quality information on which to base program management decisions.
- Inability to adequately satisfy requests for information and poor user experience with current USAspending.gov website.

Deliverables:

- Published June 2013 memo directing Federal agency CFOs to improve data quality on USAspending.gov.
- General Service Administration (GSA) handed off responsibility of the USAspending.gov to Treasury's Bureau of the Fiscal Service per FY 2014 Budget proposal.
- Continue to improve accessibility and user experience of USAspending.gov website in FY 2014 and beyond.
 - Treasury has a short term USAspending.gov improvement plan and is working on a long term improvements by the end of February 2015.
 - Going forward establish regular engagements with external stakeholders that will help inform improvements for the short term and long term.

Additional Legislative Movements: Digital Accountability & Transparency Act of 2014 (DATA Act)

- President Obama signed into law May 9, 2014 bipartisan legislation that requires Federal
 agencies to publish their spending data in a standardized, machine-readable format that the public
 can access through USAspending.gov.
- Amends the 8 year old FFATA to make available to the public specific classes of Federal agency spending data with more specificity and at a deeper level than is currently reported.
 - Expansion of Data Posted on USAspending.gov. No less than on a quarterly basis, Treasury, in consultation with OMB, shall
 report expanded data on USAspending.gov, to include obligations and expenditures related to all federal spending by
 appropriations account, object class, and program activity. Where the bill requires Federal agencies to report information by
 "program activity," Federal agencies will implement these requirements initially through reporting at the budget account level to
 avoid public reporting of information that is incomplete or potentially inaccurate.
 - Establishment of USAspending.gov Data Standards. The Act requires that Treasury and OMB, in consultation with the heads of Federal agencies, shall establish Government-wide financial data standards for information posted on USAspending.gov.
 - Recommendations for Streamlined Recipient Reporting Burden. The Act requires OMB to establish a pilot program to develop recommendations on standardizing grant and contract recipient reporting, eliminating unnecessary duplication of financial reporting, and reducing burdensome reporting requirements.



Resources





FSRS Reporting Assistance

- Federal Service Desk
 www.fsd.gov (toll free #: 1-866-606-8220)
- FSRS Resources Page

www.fsrs.gov/resources

- Quick Reference Guides for Contracts and Grants
- User Guides
 - Narrated Demonstration Videos & Webinar Archives
 - Technical Documentation
- Managing Sub-award Reporting in FSRS:
 - Add an Award to the Awardee Worklist
 - Delete an Award from the Awardee Worklist
 - Creating and Submitting a FFATA Sub-award Report in FSRS
 - Edit a Report from the FFATA Reports List
 - Review, Access and Retrieve Reports from the FFATA Reports List
 - Complete a Batch Upload for Sub-award Reporting



FSRS Reporting Assistance





FSRS Reporting Assistance

This online guide should be the <u>first resource</u> for Prime recipients reporting in FSRS. Step-by-step instructions help users navigate every action required, with great detail, screen shots, and troubleshooting.





Questions?